

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RAYMOND R. SEARS, et al.

*

Plaintiffs

*

v.

*

LEO'S VACATION CENTER, INC., et al.

*

Defendants

*

Case No. WMN 02 CV 1604

DEFENDANTS', FREIGHTLINER, LLC AND
FREIGHTLINER CUSTOM CHASSIS CORP.,
NOTICE TO TAKE DEPOSITION DUCES TECUM

Defendants, Freightliner, LLC, and Freightliner Custom Chassis Corp, by and through their attorneys,
Kara M. Miller and Franklin & Prokopik, P.C., hereby give notice pursuant to the Federal Rules of Civil
Procedure that the oral deposition for the purposes of discovery will be taken of:

Joseph R. Kuhn
Consul-Tech
14481 Storybrook Lane
Amissville, VA 20106

On Tuesday, March 11, 2003, at 10:00 a.m. at the offices of Franklin & Prokopik, P.C., One North
Charles Street, Suite 100, Baltimore, Maryland, 21201, before a Notary Public. The deponent is
requested to bring for the purpose of inspecting and photocopying, all writings and reports, hand written
reports, any document reviewed in connection with the motor home in question, the lawsuit, etc.,
photographs, diagrams, models, etc. generated at any time from any

source, pertaining to the 1999 Damon Motor Home purchased on or about June 23, 1999, by Raymond R. Sears and Jeannie Sears.

Kara M. Miller, Esquire
Franklin & Prokopik
32 W. Washington St.
Suite 6
Easton, MD 21601
(410) 820-0600
*Attorney for Defendants, Freightliner, LLC and
Freightliner Custom Chassis Corp.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 5th day of March 2003, a true and accurate copy of the foregoing **NOTICE TO TAKE DEPOSITION DUCES TECUM** of **Joseph R. Kuhn**, was mailed first-class mail, postage prepaid, to:

H. Robert Erwin, Jr.
The Erwin Law Firm, P.A.
10 West Madison St.
Baltimore, MD 21201
Attorneys for Plaintiffs

Thomas A. Imperiale, Esquire
Carson, Jones-Bateman & Dressler, P.A.
Suite 400; Charles Towson Bldg.
1104 Kenilworth Dr.
Towson, MD 21204-2101
Attorneys for Leo's Vacation Center

Linda S. Wolfe, Esq.
Adam T. Sampson, Esquire
Goodell, DeVries, Leech & Dann, LLP
One South Street
Baltimore, MD 21202
Attorneys for Damon Corporation

KARA M. MILLER

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NOTICE OF SERVICE

I HEREBY CERTIFY that on this 5th day of March 2003, a copy of Defendants', Freightliner, LLC and Freightliner Custom Chassis Corp.'s Notice to Take Deposition Duces Tecum of Joseph R. Kuhn, was mailed first class, postage prepaid, to:

H. Robert Erwin, Jr.
The Erwin Law Firm, P.A.
10 West Madison St.
Baltimore, MD 21201
Attorneys for Plaintiffs

Thomas A. Imperiale, Esquire
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*Attorney for Defendant, Freightliner, LLC
and Freightliner Custom Chassis Corp.*

